



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dr. G. A. (Jim) Shirazi, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

June 14, 1983

REGISTERED RETURN RECEIPT REQUESTED

P 396 996 767

Mr. Kent Dahlquist
Mining Engineer
Union Carbide Corporation
Metals Division
LaSal, Utah 84530

RE: Inspection of the Deremo Mine
Union Carbide Corporation
ACT/037/025
San Juan County, Utah

Dear Kent:

This letter should serve to reiterate the understandings reached during the May 25, 1983 Division inspection of the Deremo Mine. Susan Linner and I appreciated the time you took introducing us to Niels Haubold and staff and showing us around the site. As you know we were attempting to familiarize ourselves with on-site conditions and hoped to be able to discern any potential differences from the 1978 mine plan.

The complication of the minesite being situated on the Colorado-Utah border introduces certain grey areas into the regulatory process. Failure of adequate evaporation pond design or construction has produced a situation which may adversely be affecting Utah locations. Therefore it is by this letter that I am notifying the Colorado authorities at the request of Mark Loye to at least appraise them of the situation.

The vent hole access road and dike which abutts the state line seems to serve a dual purpose. This road or causeway attempts to retain mine water discharge in two ponds. At the time of the inspection the following conditions were observed:

Seepage under and through the roadway was obvious in at least two locations where no planned discharge was originally intended; i.e. no valves, culverts, pipes, etc.

Overflow of the pond was running across the road at another location at less than 10 g.p.m. This water has established a meander path into lowland field locations in Utah for which pond designs have been submitted.

Vegetation i.e. the pinyon-juniper has been killed in the immediate area and may or may not be associated with the increased runoff.

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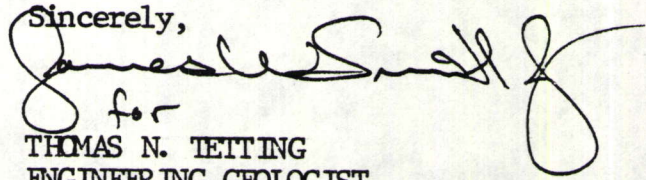
It has not been ascertained whether the private landowner (Snyder?) has had any objections. Nor has it been determined if the discharges exceed any State Health or EPA effluent limits. The appearance of insitu dead vegetation (i.e. P-J) in the Colorado side evaporation ponds indicates that no liner was ever used. During the visit it was suggested that this runoff only occurs in the spring.

A pump located at the side of the road next to the evaporation pond is used for the purpose of providing drilling water for exploration crews at Union Carbide.

During the visit it was understood that water samples were to be taken at several locations and submitted for radiometric analysis. If they have not already been taken the action is requested by this letter to establish compliance with objectives, Title 40-8-12 of the Utah Mined Land Reclamation Act of 1975, U.C.A. 1953. Copies of the analyses are directed to be submitted to the Division for review. Further action will await the substance of this report.

It is also necessary for the Division to request that new evaporation pond designs be submitted for review. It is hoped that these will be coordinated with the Colorado Mined Land Reclamation Division. The plans should address total containment, rebuilding and lining of the dike/roadway and rechanneled conveyance of the discharge to the Utah pond site(s). These designs will also need to be submitted to the Utah Department of Health (Mr. Steve McNeal) and the subsequent approval issued from the Bureau of Water Pollution Control. It is the feeling of the Division that these designs should be submitted within thirty days of receipt of this letter. I hope that this process may proceed smoothly without delving into the nature of several potential violations of the Act. It has been an extremely wet year so far and provisions for extraordinary circumstances are sometimes best seen in hindsight.

Should any questions or conflicts arise please contact me.

Sincerely,

for
THOMAS N. TETTING
ENGINEERING GEOLOGIST

TNT/lm

cc: Mike Stanton, Colorado Mined Land Reclamation Division
Jim Smith, DOGM
Sue Linner, DOGM

enclosure